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2 UNITED STATES DISTRICT COURT

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SOUTHERN DISTRICT OF OHIO

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WESTERN DIVISION

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ERIC L. JEFFRIES, :
6 :
7 Plaintiff, :
CENTRE LIFE INSURANCE : Case No. C-1-02-351
8 COMPANY, et al., : (Judge Beckwith)
9 Defendants. :
- - - - -

10

11 Deposition of MICHAEL E. LUGGEN, M.D,
12 a witness herein, called by the Defendants for
13 direct examination, pursuant to the Federal Rules of
14 Civil Procedure, taken before me, Angie Portune, a
15 Registered Merit Reporter and Notary Public in and
16 for the State of Ohio, at the offices of Wood &
17 Lamping, Cincinnati, Ohio, on Friday, September 12,
18 2003, at 10:00 AM.

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10:47:30 1 A (Witness nodded head.)

2 Q Do you know whether he had been to Belgium
3 or was planning to go to Belgium?

4 A I don't recall it. And I don't see that I

10:47:49 5 indicated one way or the other. I did suggest to
6 him, and the final sentence in that paragraph that
7 participation in a clinical trial, a research study
8 that might answer some questions, would be a
9 reasonable thing to do if there was such a thing

10:48:48 10 available.

11 Q Do you know whether he participated in any
12 such studies?

13 A I don't know.

14 Q Did you ever make a definitive -- in all

10:49:02 15 the times that you saw Mr. Jeffries, a definitive
16 diagnosis based upon objective findings of any
17 illness?

18 A No.

19 Q Were Mr. Jeffries' complaints to you

10:49:15 20 throughout the course of your treatment with him
21 consistent, or did they vary from time to time?

22 MR. ROBERTS: Objection.

23 A It seemed to me that they were consistent
24 for the most part.

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1 UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF OHIO
3 WESTERN DIVISION
4 - - - - -
5 ERIC L. JEFFRIES, :
6 vs. Plaintiff, :
7 CENTRE LIFE INSURANCE : Case No. C-1-02-351
8 COMPANY, et al., :
9 Defendants. :
10 - - - - -

11
12 Deposition of DONALD NUNLIST-YOUNG, MD, a
13 witness herein, called by the defendants for
14 cross-examination, pursuant to the Federal Rules of
15 Civil Procedure, taken before me, Connie Dupps, a
16 Registered Professional Reporter and Notary Public
17 in and for the State of Ohio, at the offices of
18 Donald Nunlist-Young, MD, 2567 Erie Avenue,
19 Cincinnati, Ohio, on Thursday, September 11, 2003,
20 at 5:30 PM.

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23 Pages: 1 - 124

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1 insurance company that this was a simple allergic
2 reaction to a vaccination?

3 A. Yes.

4 MR. ROBERTS: Objection.

5 Q. Pardon?

6 A. Yes.

7 MR. ROBERTS: Objection.

8 Q. And you complied with that request?

9 A. I complied in that I stated it was a
10 possibility, but not a certainty.

11 Q. Okay. Did he tell you when he talked to
12 you on the 9th that he had been to see Dr. Dunn on
13 the 8th with complaints of sore throat, pains in the
14 abdomen, sore muscles, and joints?

15 A. No, I believe that's my nurse's writing
16 and I did not speak with him.

17 Q. On the 9th?

18 A. On the 9th.

19 Q. Did you ever become aware he had seen Dr.
20 Dunn on the 8th with complaints of significant sore
21 throat, pains in the abdomen, sore muscles, and
22 joints?

23 A. I became aware of that through a note from
24 another arthritis specialist that he subsequently

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF OHIO

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ERIC L. JEFFRIES, :
vs. Plaintiff, :
CENTRE LIFE INSURANCE : Case No. C-1-02-351
COMPANY, et al., : (Judge S. S. Beckwith)
Defendants. :
- - - - -

Deposition of CORWIN DUNN, M.D., a witness
herein, called by the defendants for examination,
pursuant to the Federal Rules of Civil Procedure,
taken before me, Tracy L. Allen, a Registered
Professional Reporter and Notary Public in and for
the State of Ohio, at 2223 Auburn Avenue,
Cincinnati, Ohio, on Friday, September 12, 2003, at
2:15 PM.

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1 can't quite read that one. Something requesting?
2 A. Search requested. And I think it's GDL,
3 which is I think a library, but I don't recall what
4 GD stands for. That would have been the -- oh, I
5 know what it is. Gamble Deaconess Library. That's
6 the hospital library.

7 Q. Was he telling you he did the search or
8 requesting you to do it?

9 A. Requesting that I do it.

10 Q. Did you comply with the request?

11 A. I believe I did.

12 Q. Were you able to allay his fears that he
13 didn't have the objective symptoms consistent with
14 hepatitis B arthritis?

15 A. I don't believe I allayed them.

16 Q. Did you try?

17 A. Yes.

18 Q. Did he seem pretty focused on that idea at
19 the time?

20 A. Well, my recollection now is that this was
21 a recurring theme that came up other times than just
22 this telephone conversation. It was also discussed
23 at several visits. And he brought in his own
24 research materials, which indicates that this has

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